

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:)
HEATH P. KNOX, AND)
MICHELLE L. LOCKWOOD-KNOX,) Case No: 18-21765-CMB
Debtors.)
HEATH P. KNOX, AND) Chapter 13
MICHELLE L. LOCKWOOD-KNOX,) Document No.: 26
Movants,)
v.)
DITECH FINANCIAL, LLC,)
Respondent.)
RONDA J. WINNECOUR, Trustee.)

MOTION FOR LOSS MITIGATION

1. The Debtor(s) in this case hereby request the commencement of the Court's *Loss Mitigation Program* (LMP) as set forth in *W.PA.LBR 9020-1 through 9020-7* with respect to property located at: **103 Kennedy Road, Prospect, Pennsylvania, 16052.**
2. The Creditor is **Ditech Financial, LLC**, and is registered on the Portal.
3. The Creditor is the holder of a first mortgage.
4. A *Certification of LMP Eligibility and Readiness* (Local Bankruptcy Form 40) and a *Proposed Loss Mitigation Order* (Local Bankruptcy Form 41) are attached to this Motion pursuant to *W.PA.LBR 9020-2(c)*.
5. Pursuant to *W.PA.LBR 9020-2(d)*, any objection to the relief requested herein must be filed within fourteen (14) days of service of the Motion.

Date: July 11, 2018

Submitted by:

/s/ Dai Rosenblum, Esq.
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